

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

AGENDA ID # 16411
RESOLUTION G-3526
May 10, 2018

R E S O L U T I O N

Resolution 3813-G/5024-E. Pacific Gas and Electric Company (PG&E) seeks to revise its energy statements sent to customers in a Payment Arrangement program or who receive an Agency Guarantee.

PROPOSED OUTCOME:

- Adopts several PG&E proposed energy statement changes, rejects the utility's request to eliminate the Monthly Billing History chart and convert the Daily Usage Comparison chart into a table.

SAFETY CONSIDERATIONS:

- There is no impact on safety as PG&E's request only involves account information appearing on customer bills.

ESTIMATED COST:

- The estimated cost to implement the proposed bill changes is \$300,000.

By PG&E Advice Letter 3813-G/5024-E, filed on February 23, 2017.

SUMMARY

PG&E's proposed bill format changes for the designated customers are approved except eliminating the Monthly Billing History chart and converting the Daily Usage Comparison chart into a table.

PG&E seeks to modify its bills to provide additional information to customers enrolled in a Payment Arrangement program or aided by an Agency Guarantee.¹

¹ A "Payment Arrangement" is an agreement between the customer and PG&E that allows an extension of the customer's balance beyond the regular due date of their bill. An "Agency Guarantee" is a pledge from an external agency (such as The Salvation Army) to make a payment on a customer's behalf within a specified period of time. (See PG&E 6/30/17 data request response to Energy Division Question 1.)

These proposed changes include the status of the customer's account, when payments are to be made to avoid a service disconnection, and whether the utility received a remittance from an agency. Additionally, PG&E requested eliminating the Monthly Billing History chart, which illustrates past billing amounts over the prior 12 month period, and converting the Daily Usage Comparison chart showing energy usage for the past year, last period and current period into a table.

This Resolution approves PG&E's bill enhancements except for the elimination of the Monthly Billing History chart and the conversion of the Daily Usage Comparison chart to a table. The approved elements of the utility's proposal will result in a more informative bill enabling the designated customers to maintain their account in good standing and make payment decisions. Rejecting PG&E's request regarding the Monthly Billing History chart and the Daily Usage Comparison chart will retain important information useful for customers to manage their household budgets and to conserve energy.

PG&E is ordered to file a supplemental advice letter (AL) no later than 15 days from today implementing the authorization granted herein.

BACKGROUND

Decision (D.) 07-07-047 specifies procedures for PG&E to follow in order to request a change to its bill formats.

In D. 07-07-047, the Commission, approved, with modifications, PG&E's proposal to revise the bills (also referred to as "energy statements") it sends its customers for the service the utility provides. That decision also specified the information that is to be included on all of its bills such as the customer's name, location and energy usage data.² Additionally, the decision allowed PG&E to file an AL to request approval of bill revisions not considered superficial or cosmetic.³ The AL is to include samples of current bills, the final version of the bills with the requested revisions, and redline versions showing the changes made to the existing bills.

² D.07-07-047, Ordering Paragraph #9

³ D.07-07-047 Ordering Paragraph #10

Furthermore, the AL is to describe the demographics of the utility's territory and how they correspond to languages used in its bills and inserts as well as the guidelines used to ensure its website is accessible to the disabled.⁴ Prior to filing an AL, PG&E is to provide an opportunity for informal discussions on its bill change proposals with interested parties, including the Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN) and the Disability Rights Advocates (DisaRA).⁵

PG&E filed AL 3813-G/5024-E requesting to change its gas and electric bills for customers in a Payment Arrangement program or who are recipients of an Agency Guarantee.

In the AL, PG&E stated that the bill revisions are designed to improve the clarity and usefulness of the information for the designated customers. A bill showing the revisions was appended to the AL. The utility stated that it discussed its proposal with the Office of Ratepayer Advocates (ORA) and the Utility Reform Network (TURN) to determine what bill enhancements customers would find beneficial.⁶

The following are PG&E's proposed bill modifications:

- 1) A section identifying the Payment Arrangement Program the customer is enrolled in.
- 2) An alert stating that a customer's service may be interrupted if the Payment Arrangement account amount and current charges are not paid by a certain date.

⁴ *Ibid.*

⁵ D.07-07-047 Ordering Paragraph #11

⁶ OP 11 of D. 07-07-047 requires PG&E to confer with ORA, TURN and DisabRA prior to filing an AL to request bill modifications. According to the AL, PG&E only conferred with ORA and TURN. In PG&E's 6/30/17 Question 4 data request response to the Energy Division, the utility said that The Center for Accessible Technology (formerly DisabRA) declined to participate.

- 3) An “Important Messages” section is added to the bill’s first page to inform customers where they can find details about their Payment Arrangement account and if they have a pending Agency Guarantee due.⁷
- 4) The pay stub will show the total amount due which is the combined sum of the customer’s Payment Arrangement installment and the current charge less any Agency Payment.⁸
- 5) An additional page showing details about a customer’s Payment Arrangement account including the amount and due date of each installment as well as agency guarantee payment information.

Additionally, PG&E seeks to eliminate the Monthly Billing History chart from the bills and to convert the Daily Usage Comparison chart into a table.

The AL also included information addressing the requirements in Ordering Paragraph #10 of D.07-07-047. Demographic data about its service territory was provided in a table showing the percentage of calls the utility receives in non-English languages. A list showing the non-English languages used for various bill inserts was also included. A description of the standards PG&E used to develop its website was also provided and the utility stated that it is committed to improving its website for persons using assistive technology and to make its website universally accessible.

PG&E stated the estimated cost to implement the proposed bill changes is \$300,000.⁹ The utility is not seeking funding in the AL.

⁷ PG&E 2/16/18 data request response states that it currently notifies customers on their bill if an Agency Guarantee has been received and will continue to do so. The total amount due from the customer is reduced by any payment received corresponding to a customer account.

⁸ PG&E 3/5/18 data request response and 2/16/18 data request response.

⁹ PG&E 1/11/18 and 3/5/18 data request response.

NOTICE

Notice of PG&E AL 3813-G/5024-E was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

PG&E AL 3813-G/5024-E was not protested.

DISCUSSION

PG&E's proposed bill changes are approved except eliminating the Monthly Billing History chart and converting the Daily Usage Comparison chart to a table.

PG&E is seeking to revise its bills "... to improve the clarity and usefulness of the billing information on the customer energy statement."¹⁰ This is a goal we support and we will review the utility's proposal to determine whether it was achieved.

An examination of PG&E's current bill format shows a lack of information specific to customers enrolled in Payment Arrangements programs or who are subject to an Agency Guarantee. The utility seeks to address this situation by adding several new features to its bills. Specifically, details of the customers' account would be included showing the due date and amount due for each payment installment and whether an agency has committed a payment but it has yet to be received by PG&E. The total amount due from the customer would also appear on the bill combining the payment arrangement installment and current charges as well as when service could be interrupted if a remittance has not been made.¹¹ An "Important Messages" section would alert customers about the placement of information critical to the maintenance of their Payment

¹⁰ PG&E AL 3813-G/5024-E at p. 6.

¹¹ PG&E 6/30/17 data request response to Question 5 states that the AL is not changing how the service interruption date is determined which was approved in D.12-03-054.

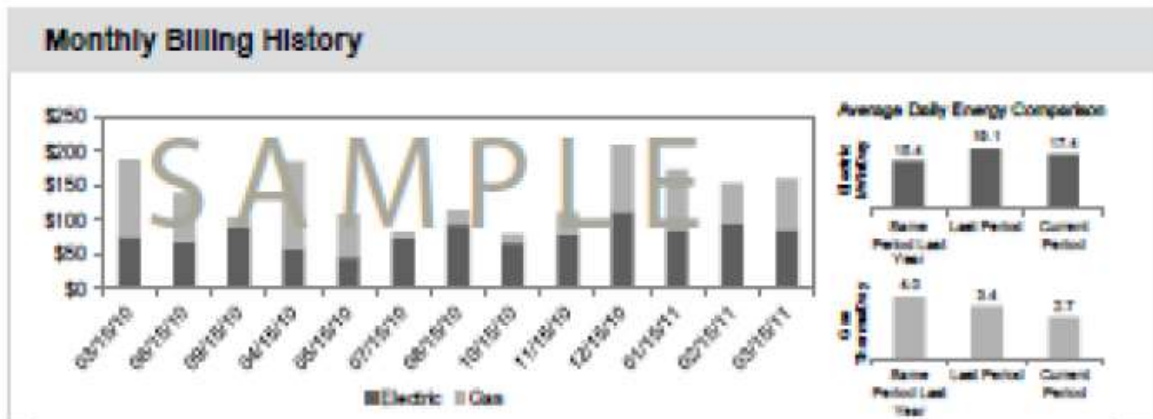
Arrangement account. Furthermore, PG&E also consulted with ORA and TURN about these proposed modifications.¹²

We find that these changes will benefit the designated customers by providing them with additional information useful for managing their finances and making decisions about bill payments. Additionally, the bill revisions will also give customers a comprehensive view of the status of their account in order to remain current. Therefore, these specific bill revisions proposed by PG&E in AL 3813-G/5024-E are approved.

However, we find that the following two PG&E proposals will *reduce* the information currently appearing on the utility's bills. The utility seeks to eliminate the Monthly Billing History chart, which illustrates the amount of each bill the customer was issued over the prior 12-month period, as well as convert the Daily Usage Comparison graph into a table.

The figures below depict the Monthly Billing History chart and Daily Usage Comparison graph as they currently appear on bills:

Figure 1 (PG&E seeks to eliminate the following charts.)



Source: PG&E AL 3813-G/5024-E Appendix A.

Figure 2 (PG&E seeks to convert the Daily Usage Comparison chart with a table.)

¹² PG&E AL 3813-G/5024-E at p. 2.

Daily Usage Graphic Comparison:



Source: PG&E 6/30/17 data request response Question 12.

PG&E explained why it proposed these changes in response to an ED data request.¹³ The utility said that the Monthly Billing History chart was being eliminated because it is not a requirement and is consistent with other billing formats. PG&E also said that customers in a focus group did not have a preference for the Daily Usage Comparison chart over a table and that the graph was inadequate for customers receiving service at more than one location. Although the Monthly Billing History chart might not be required, it contains information we find useful to customers. At a glance, customers can easily review their past PG&E payments and gain various insights. Displaying prior bill amounts enables customers to see trends and the magnitude of their energy usage in terms of expenditures over time. By discerning these patterns, customers can better manage their household budgets and be prompted to consider ways to conserve energy, particularly during high cost peak periods.

Similarly, PG&E's proposal to convert the Daily Usage Comparison chart to a table would also result in a less informative bill. A chart has certain advantages over a table. Presenting the data in a chart gives customers the ability to readily ascertain the degree to which their energy usage changed in comparison to the past. Again, this information can provide a customer with insights into their energy usage habits. A table listing only values does not provide this dimension

¹³ PG&E 6/30/17 data request response Questions 9 and 12.

to the data. It is also unclear how the graph would disadvantage customers with more than one location, as PG&E claimed.

In conclusion, we find that PG&E's rationale for the proposed changes do not outweigh the customer benefits of retaining the existing charts. Instead of making the bills more informative, the modifications would have the opposite effect. This would be contrary to the PG&E's stated goal for its proposed bill modifications. Therefore, we reject PG&E's proposal to eliminate the Monthly Billing History chart and to convert the Daily Usage Comparison chart into a table.

PG&E shall file a Tier 2 supplemental to AL 3813-G/5024-E reflecting the authority granted herein no later than 15 days of this Resolution's effective date.

In addition to the approved elements of PG&E's proposal discussed above, the supplemental AL shall also describe the demographics of the utility's territory and how they correspond to languages used in its bills as directed by OP #10 of D.07-07-047,¹⁴ correct the inadvertent deletion of the Energy Usage Graph from the redline version of the bill amended to AL 3813-G/5024-E,¹⁵ and include a redline version showing changes to the gas details portion of a bill. The supplemental AL shall also include the information in the original AL that was not rejected by this Resolution and will replace AL 3813-G/5024-E in its entirety. The supplemental AL will have a 10 day protest period.

This resolution does not change PG&E's current procedures or existing Commission requirements regarding the disconnection of customers for non-payment of charges.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment

¹⁴ PG&E AL 3813-G/5024-E only showed how the languages correspond to the utility's bill inserts.

¹⁵ PG&E 6/30/17 data request response Question 8.

prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. PG&E filed AL 3813-G/5024-E to redesign its bills issued to customers enrolled in a Payment Arrangement program or who are recipients of an Agency Guarantee.
2. PG&E's proposal to include information in the bill showing when payments are due to avoid service interruptions, the status of their account, and when Agency Guarantee payments are due benefits customers.
3. The Monthly Billing History chart provides customers with information that can help customers manage their household budgets and conserve energy.
4. The Daily Usage Comparison chart yields information for customers to determine how their usage changed over the designated periods.
5. PG&E's proposal to eliminate the Monthly Billing History chart and convert the Daily Usage Comparison chart into a table would not benefit customers as it would result in a less informative bill.

THEREFORE IT IS ORDERED THAT:

1. Pacific Gas and Electric Company (PG&E) AL 3813-G/5024-E is approved as modified herein.
2. PG&E shall file a Tier 2 supplemental AL no later than 15 days from today implementing Ordering Paragraph 1. PG&E shall also describe in the supplemental AL how demographics in its service territory correspond to languages used in its bills, include a redline version showing changes to the gas details portion of a bill, and correct the inadvertent deletion of the Electric and Gas Usage Graph in AL 3813-G/5024-E. The supplemental AL shall also include the information in the original AL that was not rejected by this Resolution and will replace AL 3813-G/5024-E in its entirety.

3. The supplemental AL referred to in Ordering Paragraph 2 shall have a 10 day protest period.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on May 10, 2018; the following Commissioners voting favorably thereon:

ALICE STEBBINS
Executive Director